

**IN THE UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF MARYLAND**

**UNITED STATES OF AMERICA**

**v.**

**WILLIAM GARFIELD BILBROUGH  
IV,**

**Defendant**

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**CRIMINAL NO. TDC-20-33**

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**GOVERNMENT’S MOTION FOR LEAVE TO FILE SUR-REPLY**

On March 17, 2020, the defendant filed his second motion to reopen his detention hearing. ECF No. 69. The Government filed its opposition the following day. ECF No. 70. In short order, the defendant filed a reply, ECF No. 71, and then what he termed “Exhibit #1” to his second motion, ECF No. 72. Exhibit #1 is a short filing attaching a letter from an Assistant Federal Public Defender dated March 18, 2020, the day after the defendant’s second motion was filed. The letter includes new information not addressed in the defendant’s second motion or reply. The Government should be permitted to respond to this new information. Accordingly, the Government moves for leave to file a sur-reply. The proposed sur-reply is attached as an exhibit to this motion, as is a proposed order.

Respectfully Submitted,

Robert K. Hur  
United States Attorney

By: /s/  
Thomas P. Windom  
Assistant United States Attorney